

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: Richard Long, Jr.</b>	)	
Christine Long	)	<b>Chapter 13</b>
Debtors	)	<b>Case No. 1:17-bk-05073-HWV</b>
	)	
<b>JPMorgan Chase Bank, National Association</b>	)	
Movant	)	
	)	
<b>Richard Long, Jr.</b>	)	
Christine Long , Respondents	)	
Charles DeHart, III, Trustee	)	

**DEBTORS' RESPONSE TO MOTION OF JPMORGAN CHASE BANK, NATIONAL  
ASSOCIATION MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11  
U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, JPMorgan Chase Bank, National Association, filed its Motion for Relief on June 7, 2018.
2. Debtors acknowledges some mortgage payments are past due.
3. Debtors desire the opportunity to cure any post-petition mortgage arrears and keep their home.
4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Richard Long, Jr. and Christine Long, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed on June 7, 2018 by JPMorgan Chase Bank, National Association.

Dated: June 21, 2018

Respectfully Submitted,

/s/Stephen Wade Parker  
Stephen Wade Parker (315606)  
Counsel for Debtor  
Mooney & Associates  
2 S. Hanover Street  
Carlisle, PA 17013  
Swp@mooney4law.com  
(717) 243-4770 Phone  
(717) 632-3612 Fax